

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

- - - - -

Tamara K. Alsaada, :  
et al., :  
Plaintiffs, :  
vs. : Case No. 2:20-cv-3431  
: Judge Marbley  
: Magistrate Judge Jolson  
City of Columbus,  
Ohio, et al., :  
Defendants. :  
- - - - -

30(b)(6) DEPOSITION OF LIEUTENANT PAUL WEINER  
VIA VIDEOCONFERENCE

- - - - -

Taken at Columbus City Attorney's Office  
77 North Front Street, 4th Fl.  
Columbus, OH 43215  
February 9, 2021, 2:22 p.m.

- - - - -

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|        |  | I N D E X | Page   |
| 1      | A P P E A R A N C E S                              | 1         | I N D E X  |
| 2      | ON BEHALF OF PLAINTIFFS:                           | 2         | Examination By                                     |
| 3      | Marshall and Forman, LLC                           | 3         | Mr. Forman - Cross                                 |
| 4      | 250 Civic Center Drive, Ste. 480                   | 4         |  |
|        | Columbus, OH 43215                                 | 5         |  |
| 5      | By Edward R. Forman, Esq.                          | 6         |  |
|        | Madelaine J. Rettig, Esq.                          | 7         |  |
| 6      | (Via videoconference)                              | 8         |  |
| 7      | ON BEHALF OF DEFENDANTS:                           | 9         |  |
| 8      | Columbus City Attorney's Office                    | 10        |  |
| 9      | 77 North Front Street, 4th Floor                   | 11        |  |
|        | Columbus, OH 43215                                 | 12        |  |
| 10     | By Alana Valle Tanoury, Esq.                       | 13        |  |
|        | (Via videoconference)                              | 14        |  |
| 11     |  | 15        |  |
| 12     |  | 16        |  |
| 13     |  | 17        |  |
| 14     |  | 18        |  |
| 15     |  | 19        |  |
| 16     |  | 20        |  |
| 17     |  | 21        |  |
| 18     |  | 22        |  |
| 19     |  | 23        | (No exhibits were marked.)                         |
| 20     |  | 24        |  |
| 21     |  |           |  |
| 22     |  |           |  |
| 23     |  |           |  |
| 24     |  |           |  |
| Page 3 |  | Page 5    |  |
| 1      | Tuesday Afternoon Session                          | 1         | THE REPORTER: Before I swear the                   |
| 2      | February 9, 2021, 2:22 p.m.                        | 2         | witness, would counsel please identify themselves  |
| 3      | - - - - -  | 3         | for the record, state who they represent, identify |
| 4      | S T I P U L A T I O N S                            | 4         | who else is in the room with them, and express     |
| 5      | - - - - -  | 5         | your stipulation that this deposition may take     |
| 6      | It is stipulated by counsel in attendance that     | 6         | place with a remote administration of the oath and |
| 7      | the deposition of Lieutenant Paul Weiner, a        | 7         | remote reporting of the deposition.                |
| 8      | witness herein, called by the Plaintiffs for       | 8         | MR. FORMAN: Hi. Thank you. My name                 |
| 9      | cross-examination, may be taken at this time by    | 9         | is Ed Forman. And there's nobody in the room with  |
| 10     | the notary pursuant to notice and subsequent       | 10        | me. I believe that Mattie Rettig from my office    |
| 11     | agreement of counsel that said deposition may be   | 11        | is here as well. And, yeah, we do so stipulate.    |
| 12     | reduced to writing in stenotypy by the notary,     | 12        | We're here on behalf of the plaintiffs.            |
| 13     | whose notes may thereafter be transcribed out of   | 13        | MS. TANOURY: Hi. Alana Tanoury here                |
| 14     | the presence of the witness; that proof of the     | 14        | on behalf of the defendants. I am alone in my      |
| 15     | official character and qualification of the notary | 15        | office, and Lieutenant Weiner is also at the City  |
| 16     | is waived.   | 16        | Attorney's Office but in a separate conference     |
| 17     | - - - - -  | 17        | room. And we stipulate to the taking of the oath   |
| 18     |  | 18        | virtually.   |
| 19     |  | 19        | - - - - -  |
| 20     | LIEUTENANT PAUL WEINER                             | 20        | LIEUTENANT PAUL WEINER                             |
| 21     | being first duly sworn, testifies and says as      | 21        |  |
| 22     | follows:   | 22        |  |
| 23     | - - - - -  | 23        |  |
| 24     |  | 24        |  |

1           CROSS-EXAMINATION  
 2 BY MR. FORMAN:  
 3 Q.     Hi. Thank you. Could you begin by  
 4 stating your name for the record?  
 5 A.     It's Lieutenant Paul Weiner,  
 6 W-E-I-N-E-R.  
 7 Q.     Thank you, Lieutenant Weiner. I met  
 8 you briefly off the record there a second ago.  
 9 And I am just going to be asking you a series of  
 10 questions today. I'm going to try to keep it as  
 11 quick and painless as I possibly can.  
 12       And I am just going to begin with a  
 13 couple of preliminary questions. The first is  
 14 that I -- I can at times talk a little bit  
 15 quickly. So if you don't understand a question, I  
 16 ask, feel free to tell me that and tell me to stop  
 17 or say it again or rephrase it. It won't bother  
 18 me in the slightest.  
 19 A.     Okay. Understood.  
 20 Q.     Thank you.  
 21       And if you don't -- if you do answer a  
 22 question, I'm going to assume that you understood  
 23 it; is that okay?  
 24 A.     Yes.

1 be a problem. So I'm going to see what I can do  
 2 to turn that up if that's all right with you.  
 3 A.     Okay.  
 4       MS. TANOURY: I can come check -- can  
 5 we go off the record for a second?  
 6       MR. FORMAN: Oh, sure.  
 7       (A short recess is taken.)  
 8 BY MR. FORMAN:  
 9 Q.     Yeah. Please just let me know if you  
 10 can't hear. Just, you know, just tell me and  
 11 we're happy to deal with it at that point.  
 12 A.     Okay.  
 13 Q.     And I believe you said your present  
 14 employer was the Columbus Division of Police,  
 15 right?  
 16 A.     Yes, sir. That's correct.  
 17 Q.     I know that you're a lieutenant. Do  
 18 you supervise any particular area?  
 19 A.     Yes. I'm the traffic operations  
 20 section lieutenant, so freeways, motorcycles,  
 21 commercial enforcement, OVI enforcement.  
 22 Q.     Okay. Who do you presently report to  
 23 you?  
 24 A.     My boss is commander Terry Moore,

1 Q.     And you are doing a great job with this  
 2 already. You probably have been deposed before  
 3 and, you know -- but I don't know. But you're  
 4 doing a great job with this already. But we can  
 5 only take down verbal statements here. A nod of  
 6 the head or a shaking of the head, I'll probably  
 7 understand what you mean, but it won't be clear  
 8 for the record. So the court reporter may ask you  
 9 to clarify something for that, if that's okay.  
 10 A.     Understood.  
 11 Q.     I ask this question of absolutely  
 12 everybody. It has nothing to do with you  
 13 individually. But have you taken any medication  
 14 or have a health issue today that would inhibit  
 15 your memory?  
 16 A.     No, I have not.  
 17 Q.     Okay. Who is your present employer?  
 18 A.     I'm sorry?  
 19 Q.     Who is your present employer?  
 20 A.     Yeah. The volume is just minimal. I  
 21 can hear you, but I -- it's 100 percent on my end.  
 22 But my present employer is City of Columbus,  
 23 Division of Police.  
 24 Q.     Do you know what, I don't want this to

1 traffic bureau commander.  
 2 Q.     And so I get a little bit more of a  
 3 feel for the structure, who reports to you?  
 4 A.     So I have six sergeants. So the first,  
 5 second and third shift freeway patrol, two  
 6 motorcycle unit sergeants, and an OVI enforcement,  
 7 we call him OVI countermeasures/training sergeant.  
 8 And then within -- under those sergeants, there  
 9 are approximately 45 officers.  
 10 Q.     Okay. Thank you.  
 11       You are here today because you are  
 12 designated by the City of Columbus to speak on a  
 13 couple of issues on behalf of the City under a  
 14 Rule of Civil Procedure called 30(b). And I'm  
 15 just going to tell you that you were identified as  
 16 speaking to mutual aid agreements regarding  
 17 traffic on behalf of the Division of Police. And  
 18 essentially, what we had asked for was somebody  
 19 who can speak to the arrangements between CDP and  
 20 law enforcement personnel from mutual aid entities  
 21 to police demonstrations after the killing of  
 22 George Floyd on May 5th, 2020, including  
 23 compliance with CDP policies, such as the use on  
 24 nonlethal force cameras and being readily

1 personally -- identifiable onlookers. You were  
 2 designated as speaking to all of that. You are  
 3 exclusively designated as speaking to mutual aid  
 4 regarding traffic. Is that something that you are  
 5 prepared to testify to today?

6 A. I believe I am, yes.

7 Q. Okay. So can you just tell me a little  
 8 bit, just kind of give me an overview of -- you  
 9 know, maybe it's not a great way of asking. But,  
 10 you know, you supervise these individuals. But  
 11 what is your department mostly in charge of? I  
 12 know you mentioned OVI enforcement and some other  
 13 things, but --

14 A. So day-to-day operations I have three  
 15 shifts of freeway patrol, first, second and third  
 16 shift. They patrol the entire city freeway  
 17 system. Two shift of motorcycles, a first shift  
 18 and what we call day mid watch, so roughly the  
 19 hours of 6:30 to 6:30, about 17 motor officers and  
 20 two sergeants. Two commercial enforcement vehicle  
 21 officers. And then an OVI countermeasures  
 22 sergeant. So in other words, I oversee the OVI  
 23 countermeasures for the entire division, but I  
 24 only have a single supervisor that kind of is the

1 Q. Got it. You're more implementation?  
 2 A. Yes, sir.

3 Q. Okay. No worries. I'm going to do  
 4 that about 16 more times myself, so it's all  
 5 right.

6 Taking a look at that then, I had  
 7 mentioned incidence where traffic was closed down.  
 8 And you said you did have some involvement in  
 9 that. Can you tell me a little bit more about  
 10 that?

11 A. Yeah. It's a wide-ranging thing. But  
 12 generally on the freeway systems, whenever there's  
 13 -- we call it a TERT closure, a traffic emergency  
 14 response event, a fatal crash, a HAZMAT incident,  
 15 something that's going to result in the closure of  
 16 a main arterial street, a freeway, a secondary  
 17 road for more than two hours, 24 hours a day I  
 18 would be notified to respond and help coordinate  
 19 the traffic patterns around that issue or  
 20 incident.

21 Q. Okay. Could you give me an  
 22 example of what sort of an incident might cause  
 23 something like that?

24 A. Oh, a fatal traffic crash, a traffic

1 coordinator trainer for those programs.  
 2 Q. And forgive me. I'm just ignorant of  
 3 the way in which the police would handle traffic  
 4 in a city. So you've got these individuals  
 5 reporting to you. I mean, are you involved --  
 6 let's go ahead and strike all that.

7 But are you involved, for example, in  
 8 the planning of traffic patterns throughout the  
 9 city?

10 A. Yeah. I sit in a lot of meetings with  
 11 various traffic entities, respond to major  
 12 crashes, those types of things.

13 Q. Got it.

14 Would it fall within your purview to be  
 15 involved in shutting down various streets and  
 16 certain events?

17 A. Absolutely.

18 Q. Okay. Are you involved in I guess I  
 19 would say the creation of policy with regard to  
 20 how traffic in the city is handled?

21 A. I would say no, I'm not involved with  
 22 policy. I do attend a lot of meetings and I get  
 23 to weigh in on some things. But I'm not in charge  
 24 of policy at large.

1 crash involving a hazardous materials spill, a  
 2 truck striking a bridge on a secondary road. Say  
 3 Broad Street under Glenwood, a struck strikes the  
 4 bridge, and we're going to close the bridge for  
 5 three hours while the engineers come out to look  
 6 at the bridge to determine the structural  
 7 soundness of the bridge, so we -- I would be -- if  
 8 it's more than two hours and it's a major arterial  
 9 street, I would come in to help arrange the  
 10 detours around that.

11 Q. Great.

12 I should probably ask this, when you  
 13 say "secondary road," could you tell me what that  
 14 means? I can guess at it, but I don't want to be  
 15 wrong.

16 A. Yeah. I'm talking other than  
 17 residential streets. You know, like main  
 18 thoroughfares, arterial streets, Morse Road,  
 19 Cleveland, Broad Street, those types of streets.  
 20 Individual neighborhoods is something that a  
 21 patrol officer would handle or his supervisor  
 22 would handle.

23 Q. Got it.  
 24 So you're notified about something like

1 that. Are there any official city policies with  
 2 regard to when traffic gets shut down in  
 3 particular events?  
 4 A. We have a Traffic Emergency Response  
 5 Team and there's policies regarding that team,  
 6 yes.  
 7 Q. I know you get notified if it's going  
 8 to be more than two hours. If it's going to be  
 9 less than that, who would have the -- well, I  
 10 guess you wouldn't be notified. Who would be in  
 11 charge of that? Is that a fair question or --  
 12 A. Well, I mean, in a nutshell, the first  
 13 responding supervisors and/or their lieutenants  
 14 would be responsible for a closure until the point  
 15 they notified me of the closure. I get notified  
 16 all the time of things that are less than two  
 17 hours, you know, an hour and a half, you have a  
 18 really serious injury crash and they're debating  
 19 whether they're going to hold it as a fatal crash,  
 20 and that will determine if accident investigation  
 21 is going to come out and do an investigation  
 22 that's going to last two more hours. But they a  
 23 lot of times notify me before they get the updated  
 24 condition at the hospital. So the victim's

1 course. If it happens at, say, 161 and 71 north,  
 2 we would come all the way back down to 670 and  
 3 shut it off to keep traffic on the freeway system.  
 4 Because I can't dump all of 71 north traffic onto  
 5 17th or Hudson or Morse Road. So we try to shut  
 6 it off at a freeway. If we can't do a freeway,  
 7 the next major option would be a state route. So  
 8 if you are coming into the city say from the west  
 9 side, your 70 east, and there's a crash before  
 10 Rome-Hilliard Road, we would go all the way out  
 11 into Madison County, reach out to our partners at  
 12 Ohio State Highway Patrol and Madison County  
 13 Sheriff's Office, and put traffic off at State  
 14 Route 142, because we can't put all of 71 east  
 15 onto Rome-Hilliard Road.  
 16 Q. Got it. That makes sense. As someone  
 17 who used to live next to Hudson and 71, I'm quite  
 18 appreciative of that as well.  
 19 A. Now, I would also add, though, that  
 20 secondary roads, arterial streets would be a  
 21 different scenario because we don't have to do it  
 22 that way. But we have to -- wherever we're  
 23 detouring the traffic has to be able to handle the  
 24 volume of traffic. If we're going to put traffic

1 transported in critical condition, but upon  
 2 arrival at the hospital it's determined that  
 3 they're going to survive, so accident  
 4 investigation is not coming out. So an hour and a  
 5 half into this, we release it and I don't even  
 6 respond. If it's determined it is going to be  
 7 life threatening and then AIU is going to respond,  
 8 then I would respond.

9 Q. That makes sense. So when we talk  
 10 about closing down traffic, I'm just going to try  
 11 to get my head around the concept a little bit.

12 I guess in the incident you're saying,  
 13 I don't know, a fatal wreck on a freeway if that  
 14 makes sense. How would traffic be dealt with at  
 15 that point if it's going to be closed down?

16 A. So as a general rule on freeways -- in  
 17 Columbus, we're kind of fortunate. There are so  
 18 many highways that run through Columbus, if it's  
 19 going to be more than a two hour closure, we  
 20 generally go back to the junction of another major  
 21 freeway. So if it's 315 northbound at Goodale, we  
 22 would go back to 315 and 70 and shut it down. And  
 23 we shut it at a major freeway because we have  
 24 oversized trucks, HAZMAT loads that can't go off

1 off of Broad Street into a neighborhood street,  
 2 it's got to be able to handle that kind of volume  
 3 of traffic.  
 4 Q. Yeah. That's a good starting point.  
 5 So we can probably talk about secondary roads  
 6 then. So taking us off of the freeway, say we  
 7 have -- I don't know -- we've got a bad situation  
 8 at -- I don't know, let's say Summit and Fifth or  
 9 something like that. How would you -- how would  
 10 you go into looking about how to reroute traffic  
 11 for something like that?

12 A. Same kind of general principle, but we  
 13 might cut it off at Fourth, you know, in a --  
 14 we'll try to use some kind of main thoroughfares  
 15 to keep traffic flowing as best we can. We have  
 16 to be cautious in neighborhoods because we have  
 17 people that live in the neighborhood. So the  
 18 bigger out we make the closures, the more  
 19 difficult filtering of traffic we have to do to  
 20 get them into the affected area.

21 MS. TANOURY: Hey, Ed -- and I'm giving  
 22 leeway here to get into the background of what he  
 23 does. But we're kind of off topic from what he's  
 24 designated for.

1       MR. FORMAN: Okay. Well, I guess in  
 2 order to -- you know, get the understanding of  
 3 when we have people coming in to help out with the  
 4 traffic, I kind of have to get my head around  
 5 traffic a little bit, so --

6       MS. TANOURY: That's fine.

7 BY MR. FORMAN:

8 Q.     Okay. All right. So I'm just going to  
 9 give you an example of just a standard toxic waste  
 10 spill in the city -- I don't know -- some  
 11 secondary road somewhere. Just walk me through  
 12 that process. Once you're notified of a spill,  
 13 what are the practical steps, the first thing that  
 14 your department would be doing?

15 A.    So that's a different scenario as well  
 16 because now we're going to rely on fire to tell us  
 17 what the scenarios -- what the shutdown is going  
 18 to be. So it's going to depend on what type of  
 19 chemical is spilled, what direction is wind is  
 20 coming. The fire chief or the fire boss is going  
 21 to tell me or a patrol lieutenant, hey, we need  
 22 eight blocks south and four blocks west as a  
 23 containment area because of the HAZMAT of the  
 24 fallout. So that's going to be a different

1 opened up as fast as we can, you know, barring  
 2 injury and that kind of thing. If it's blocking,  
 3 they may shut down High Street just between the  
 4 affected area of where the crash is. But as  
 5 traffic starts to back up and they start to  
 6 realize that this isn't going to be a five-minute  
 7 closure, they may notify their sergeant. Their  
 8 sergeant may come out and say, hey, let's close  
 9 northbound High Street at State Street, let's  
 10 close southbound High Street at Gay or whatever  
 11 street they determine, and they'll try to -- and I  
 12 would do the same thing. Try to figure out how  
 13 we're going to route traffic around this problem.  
 14 So we're going to send traffic northbound west on  
 15 -- I'm sorry, east on State to north Third Street  
 16 and then continue up north to Broad Street and  
 17 then continue from there, or southbound the same  
 18 thing.

19       And then depending on the length of the  
 20 closures depend on how involved it gets. Usually  
 21 if we call the Traffic Emergency Response Team,  
 22 the thing I bring to the table that patrol doesn't  
 23 have is I work with traffic engineering very  
 24 close, so I can get barricades and sign boards and

1 scenario than just traffic. Now, we do those as  
 2 well, but that's going to be based on fire's  
 3 recommendation.

4 Q.     Okay. We'll just call it an accident  
 5 where something gets -- something gets -- you  
 6 know, it's not a -- let's get away from hazardous  
 7 waste then.

8       So just say it's an accident and it's  
 9 closed down an intersection and it's reported  
 10 there's an officer on the scene. What are the  
 11 steps that happen from there?

12 A.    I'm not sure of the question exactly.

13 Q.     Yeah. No problem.

14       So I'm just trying to get -- so say  
 15 there's a traffic crash in the middle of say Broad  
 16 and High. And what happens? I assume that police  
 17 get called to the scene. But I'm just trying to  
 18 figure out the steps that the police department  
 19 would take. Like is it originally dealt with by  
 20 the first officer who arrives? How does it work?

21 A.    Yeah, absolutely. The first responding  
 22 officer will see if they can take care of it. We  
 23 generally have what's called a quick clear policy  
 24 in the division, so we try to get the street

1 cones and those types of things.

2 Q.     Okay. Tell me a little bit more about  
 3 that. What is the process of actually blocking  
 4 off a street, like, when you get involved?

5 A.    Well, I mean, generally it's a cruiser,  
 6 or at least when I get there. But again for  
 7 long-term closures, particularly on the freeway,  
 8 that's -- it's not safe. So we want to get some  
 9 arrow boards out there, we want to get -- you  
 10 know, if you are going to close a freeway lane, we  
 11 want about a half a mile of cones. There's  
 12 actually NHTSA rules about how to do that. So  
 13 we'll call in ODOT or city traffic engineers,  
 14 they'll bring crews out with arrow boards, extra  
 15 cones, extra barrels, and we'll do the closures  
 16 according to the NHTSA guidelines if it's going to  
 17 be more than two hours. It's got to be worth the  
 18 time to set it all up. We don't want to set it  
 19 all up and immediately tear it back down. But we  
 20 try to make it as safe as we can. So, you know,  
 21 we'll replace the cruisers with maybe a road  
 22 closed sign, but we'll still man the road closed  
 23 sign with the cruiser to make sure that it's  
 24 enforced.

1 Q. Okay. Are there any -- I guess maybe I  
 2 want to use term pre-plans essentially. But are  
 3 there any, you know, plans in place? You know, I  
 4 think like, for example -- an example you used is  
 5 we're going to have something nasty that happens  
 6 on 71 at, say, like, 17th or something like that.  
 7 Are there existing plans in place that say, all  
 8 right, if we have a traffic accident in this area  
 9 and we need to reroute people, here is how we are  
 10 going to do it?

11 A. There are not for traffic accidents.  
 12 There are for other things. We do presidential  
 13 visits and vice presidential visits, so  
 14 motorcades.

15 Q. Right.

16 A. We always pull out old plans,  
 17 especially if we're going to similar locations or  
 18 we're going to use some parts of the -- some legs  
 19 of the same original plan. So we'll use that as a  
 20 starting point. During the protest, for example,  
 21 I created two or three traffic plans for the  
 22 statehouse and city hall that we could use on a  
 23 recurring basis and that could be used when I  
 24 wasn't there.

1 But generally speaking, we evaluate  
 2 each situation because they're always different.  
 3 It's hard to say you're going to have -- this is  
 4 the plan for 71 and Morse because you don't know  
 5 if there's going to be HAZMAT involved in it or  
 6 the length of the closure and all of those kind of  
 7 things. But like I mentioned earlier, we operate  
 8 under the philosophy that we're going to try to  
 9 close a freeway at a freeway.

10 Q. Got it. Now, that's very helpful.

11 Thank you.

12 You had mentioned that you had put in  
 13 some plans during the protest. Are you referring  
 14 to the protests in late May and early June?

15 A. I am, sir.

16 Q. Okay.

17 A. Actually all year for all of 2020.

18 Q. Okay. So can you tell me a little bit  
 19 more about those plans. Like how are they  
 20 created? Who was involved?

21 A. Yeah. Early during the protests in  
 22 May and the first part of June, I was literally  
 23 there 16 hours a day, so I would coordinate those  
 24 plans if need be. Actually, we did different

1 plans for that, so I'm sure you'll get to that.  
 2 But as things kind of quieted down and  
 3 the protests became more of a weekend event, you  
 4 know, like, a planned -- we know there's going to  
 5 be a protest at the statehouse on Saturday. As a  
 6 matter of fact, there was one today. So in the  
 7 emergency operations center there's -- I have a  
 8 traffic plan for the statehouse that predesignates  
 9 10 traffic posts, 20 traffic cones, four road  
 10 closed signs. And whether I'm there or not, any  
 11 commander or deputy chief would be able to look at  
 12 that and say I need 10 cars at these locations,  
 13 and then they would call me and I would call city  
 14 traffic engineers to get the four road closed  
 15 signs and the 20 traffic cones. For a protest at  
 16 the statehouse, generally we're not going to shut  
 17 traffic down unless the protest spills into the  
 18 street and becomes dangerous to the protesters or  
 19 the motoring public. At that point, though, we  
 20 predesignated where we would close off a protest  
 21 that's limited to the area around the statehouse.  
 22 Q. So you mentioned you created these  
 23 plans. And do you know when -- I mean, I want to  
 24 say the protest began on May 28th. Do you know

1 how quickly you put those plans together or --  
 2 A. So we have totally different plans that  
 3 we used in May and June, which were much bigger,  
 4 much more labor intensive. The plan I just  
 5 described to you with the 10 traffic posts  
 6 probably wasn't born until about August when this  
 7 was -- when it was obvious we were going to  
 8 continue to have protests, and I can't be here  
 9 seven days a week.

10 Q. Right.

11 A. Chief Woods asked me at the time if I  
 12 could create a plan to put up in the EOC that all  
 13 the commanders could have. It's kind of like  
 14 traffic for dummies, for lack of a better way to  
 15 say it. But it literally shows post 1310, it's on  
 16 a map, it's colored, numbered. So you can look  
 17 right at it and go post 2 is right here, and  
 18 there's one intersection at Gay and Third that's a  
 19 little bit complex that takes 20 traffic cones.  
 20 So it's a diagram of the traffic cone pattern, and  
 21 then the four places we'd put road closed signs up  
 22 if it was going to last very long.

23 Q. Got it.

24 Do you know approximately when Woods

1 asked you to do that?

2 A. No. It was just we were in meetings

3 constantly about protests. And at some point I

4 couldn't be there on a Saturday and Chief Woods

5 was a deputy chief at the time and he said, hey,

6 could you put a plan together that patrol could

7 just initiate, like, without calling in traffic

8 resources spontaneously? And I said yes, sir.

9 And that's how that particular plan was born. And

10 then there's a spinoff of it for the city hall

11 that adds three more traffic posts that would

12 incorporate the area around city hall as well.

13 Q. Okay. And do you know if that Saturday

14 was just a few days after the protests began or

15 was it further down the road than that?

16 A. No, it was definitely sometime late

17 summer, mid to late summer. It had nothing to do

18 with the initial first six weeks of the protest or

19 riots. Now, I do have plans for that period of

20 time as well.

21 Q. What do you mean by that?

22 A. Well, I mean, there are -- there are

23 plans that we used during the actual rioting and

24 protesting that we repeated, and I have those

1 Q. All right. "Innocent traffic" is my

2 phrase for the day. Thank you very much for that.

3 That was awesome.

4 All right. So in terms of where you

5 get -- I guess let me see if I'm getting at this

6 well. But I assume that implementation of a plan

7 like this, like the one you were just describing

8 on the numerous city blocks, was that downtown by

9 the way?

10 A. I'm sorry. Was the traffic pattern

11 downtown?

12 Q. I'm so sorry. I confused this and then

13 I started talking about innocent traffic.

14 But you had mentioned at one point

15 there was a large, large area sectioned off to

16 deal with the protests. Was that downtown?

17 A. Yes, sir.

18 Q. Okay. Do you know if it included the

19 intersection of Broad and High?

20 A. Oh, absolutely.

21 Q. Okay. Do you have any idea how far

22 north it went from that or --

23 A. Well, starting on the second day of the

24 riots, so May 29th, we did an inner perimeter

1 plans as well. That's a different animal, but I

2 have those plans.

3 Q. Are those plans in writing anywhere or?

4 A. Yes.

5 Q. And those are sort of put together more

6 on the fly, is that --

7 A. Well, in the case of the riots, they

8 were put together on the fly. And what ultimately

9 we had to do is we tried for a couple days to just

10 keep a perimeter around protesters and rioters

11 that was always in a state of movement, and it was

12 nearly impossible to do. At some point we decided

13 we had to put a -- like, a solid perimeter around

14 about a 15-square block area. And the goal being

15 to, A, protect the protesters and the -- and the

16 police and, B, to turn innocent traffic out of the

17 area. Because we couldn't just have traffic

18 flowing in the area and then getting bottlenecked

19 and getting caught in these roving protests. And

20 then we also have to provide ingress and egress

21 for fire and medics and things like that. So we

22 had to at some point start doing some kind of

23 traffic containment for a larger area around the

24 statehouse.

1 between Spring Street and 70 and 315 to the west

2 and Fourth Street to the east. And then starting

3 on the third night, we expanded that. We'd kept

4 that inner perimeter we called it and we expanded

5 an outer perimeter clear out to the inner belt, so

6 670, 70, 71 and 315. Not all day, but during --

7 during peak protest riot hours, you know, when we

8 needed to.

9 Q. Got it.

10 Peak protest is good.

11 A. Yeah. Peak hours.

12 Q. Peak hours.

13 Do you have any idea when those peak

14 hours -- oh, does peak hours mean something to

15 you? Is it a particular period of time or is it

16 just --

17 A. No. Well, it's kind of mission

18 critical. So like the second night when we first

19 established the inner perimeter, it was because we

20 couldn't get control of the downtown area.

21 Rioters were being resupplied by vehicles driving

22 into the area. We had SUVs, dirt bikes, cars

23 doing doughnuts, operating recklessly, tearing up

24 the Columbus Commons. And they were putting

1 everybody at risk in the downtown area. So that's  
 2 when we decided we had to, like, lock down that  
 3 area I just described to you to prevent any  
 4 vehicle traffic from getting in or out, except for  
 5 police, fire and the media and a few nonessential  
 6 people. Like Grant Hospital was caught up in  
 7 parts of that. Like somebody might have an  
 8 emergency --

9 Q. Sure.

10 A. -- so we had to obviously let those  
   11 people through. But that was set up based on the  
   12 necessity of the situation. As the days  
   13 progressed, we generally briefed a roll call at  
   14 5:30, not every day but some days, with the mutual  
   15 aid officers and the traffic officers and the  
   16 National Guard. And then we implemented the  
   17 traffic plan generally around 7:00, but it was  
   18 always on the approval of the incident commander  
   19 when he felt it was necessary. So sometimes a  
   20 little later, sometimes a little faster.

21 Q. Okay.

22 A. Based on the crowd being in the street,  
   23 you know, on one of the days just as an example,  
   24 crowd size was estimated as 5,000 people, and they

1 A. Yeah. But -- yes, that was the first  
 2 night of the plan -- that was the night I was  
 3 called into work about 8:30 that evening. On my  
 4 way in, I started understanding the gravity of the  
 5 situation. I was listening to the radio and I  
 6 could hear what was going on. I called in from  
 7 home nine motorcycle officers and the two  
 8 motorcycle sergeants. I had on duty second shift  
 9 freeway. And then at 9:30 at night, I pulled in  
 10 third shift freeway to come on duty and I held  
 11 second shift overtime. Had about 30 traffic  
 12 officers and myself. And that entire night until  
 13 about 5:30 in the morning, we essentially just  
 14 worked to keep a perimeter around the moving riots  
 15 to keep innocent traffic turned out of the area  
 16 and to try to protect the flanks of the officers  
 17 and the crowds to prevent cars from driving into  
 18 the crowds at high speeds or being operated  
 19 recklessly or resupplying the rioters.

20 Late that night we tried to put an  
 21 impromptu inner perimeter together like I  
 22 described to you earlier, Spring Street to 70.  
 23 And this was probably 2:30, 3:30 in the morning,  
 24 315 to north Fourth Street. But I only had 30

1 were walking through -- you know, northbound on  
 2 High Street, northbound on Fourth Street, Spring  
 3 Street, going the wrong way against traffic and  
 4 totally gridlocking traffic and traffic motorists,  
 5 so that was a day we were trying to rush to get it  
 6 out.

7 Q. Got it. Thank you. That's very  
   8 helpful.

9       Do you know -- I guess I'm just going  
 10 to ask you sort of about the level -- we're going  
 11 to be talking a little bit about bringing in other  
 12 departments in a little bit. But I'm just trying  
 13 to get a feel for the amount of officers that  
 14 would be involved in setting up a plan like that.  
 15 I guess the person power -- maybe you understand  
 16 what I'm talking about. But the level of effort I  
 17 guess is what I would say.

18 A. Yeah. I mean, I'd almost have to walk  
 19 you through the timeline of how it evolved if  
 20 that's what you're asking me to do.

21 Q. Sure. We could try that a little bit.  
 22 I mean, do you remember, for example, on the 28th  
 23 eventually a plan was implemented? That's the  
 24 first night of the protests, a Thursday.

1 people, so we couldn't cover alleys and parking  
 2 lots and, you know, you -- cars can still come in  
 3 and get out. We just -- we tried to do the best  
 4 we could. And I tried to keep officers still with  
 5 the moving field forces and -- and rioters, and it  
 6 was -- it was extremely difficult to do.

7       On the second night, so Friday night  
 8 the 29th, came back in at, like, 1:00 in the  
 9 afternoon, watched it develop all day long, tried  
 10 the same plans we tried the night before.  
 11 Somewhere close to midnight it was totally out of  
 12 control, there -- people were just -- you know,  
 13 things were burning, there was looting going on.  
 14 And it was widespread, it was all over from  
 15 Bicentennial Park clear up to Spring Street and  
 16 from, you know, city hall east to Fourth and Fifth  
 17 Streets. And it was very, very widespread. It  
 18 was nearly impossible to keep any kind of a  
 19 perimeter around that.

20       One of the patrol lieutenants called  
 21 and said, hey, can you shut down traffic to the  
 22 part of the downtown area to this? And I said I  
 23 couldn't do it with the number of people I had.  
 24 And I did not want to pull patrol officers out of

1 field forces to come work traffic.  
 2 I ended up going to the emergency  
 3 operations center with all the bosses and outside  
 4 agencies that were there, which was, like,  
 5 Franklin County and Ohio State Highway Patrol,  
 6 Fire, other agencies. We had a meeting about it.  
 7 I suggested and it was discussed reaching out for  
 8 mutual aid, got approval from the incident  
 9 commander. That night we reached out I think we  
 10 had approximately 24 mutual aid officers respond.  
 11 I had them meet offsite in a lot next  
 12 to Vets Memorial west of downtown. When I say we,  
 13 that night I did not go out on the briefing, my  
 14 sergeants did because it was a very fluid,  
 15 evolving emergency. But they met them there and  
 16 kind of briefed them, recorded what agencies were  
 17 there. And it wasn't like we assigned them to  
 18 traffic posts, but we wanted to, like, lock down  
 19 that inner perimeter that I described to you. So  
 20 we put them in, like, 10-cruiser convoys, and then  
 21 my -- two of my sergeants led them around in a  
 22 line and literally would come to a parking lot and  
 23 said you're going to be here in this parking lot,  
 24 no southbound traffic, take the next one to the

1 so no traffic could exit off of 670, 70 or 71 or  
 2 315 on into downtown, and we closed all the  
 3 secondary roads. And unless you had a place to  
 4 be, an address, you know, you had to be at work,  
 5 had to go to the hospital, we turned you away from  
 6 downtown. No deliveries. No Uber. No Uber Eats.  
 7 You know, no random vehicles that didn't have a  
 8 reason to be in the downtown area. We were less  
 9 stringent on the outer perimeter and more  
 10 stringent on the inner perimeter. The inner  
 11 perimeter was pretty strictly police, fire, media,  
 12 and anybody that had to absolutely be in the area,  
 13 a resident, somebody going to the hospital,  
 14 something like that.  
 15 Q. Okay. Thank you.  
 16 Just I think you mentioned that's the  
 17 third day of the -- of what was happening. So do  
 18 you have any idea -- I know you said that started  
 19 around, like, 1:00 p.m. Do you have any idea if  
 20 High Street was ever closed down during that time  
 21 period or any portion before it, before that time?  
 22 A. I'm sorry. What are you saying started  
 23 at 1:00 p.m.?  
 24 Q. Well, no. I'm so sorry. I think you

1 alley. You're going to be here in the alley, no  
 2 southbound traffic. My traffic guys took the  
 3 major intersections. We used all of those mutual  
 4 aid cars to plug the gaps.

5 Q. Got it.

6 A. That was Day 2.

7 Day 3 it was obvious in the afternoon  
 8 it was growing and was potentially going to be a  
 9 bigger problem, so that would have been Saturday  
 10 night. And I came in early in the afternoon, and  
 11 through discussions in the afternoon got approval  
 12 from the incident demand commander to make the  
 13 mutual aid request earlier in the day. And that  
 14 day was the largest response we had for mutual aid  
 15 cruisers, which was about 96 I think was about the  
 16 number.

17 Q. Wow. Okay.

18 A. So 96 officers and/or cruisers. And  
 19 then starting Sunday, the National Guard had --  
 20 now starting Saturday night, the Mayor declared an  
 21 emergency. And so starting that night when we had  
 22 the 96 officers, based on the emergency, we  
 23 decided to do an inner perimeter and an outer  
 24 perimeter. So we moved it out on the inner belt,

1 had mentioned that you originally sought mutual  
 2 aid, bringing more people in around 1:00 p.m. Did  
 3 I get that wrong? It's okay. I get things wrong.  
 4 A. No. So on the second day, the decision  
 5 was made about midnight to do the mutual aid  
 6 request, that would have been on Friday night.

7 On Saturday I had to sleep at some  
 8 point. I was getting off 5:00, 6:00 in the  
 9 morning and I left one of my sergeants in charge  
 10 to be -- stand in my place while I was sleeping  
 11 for a few hours every day. So I would get back as  
 12 early in the afternoon as I could.

13 When I came in in the afternoon on  
 14 Saturday, the discussion was -- because it's about  
 15 a five-hour proposition to do the mutual aid  
 16 request. So we put the request out, it takes a  
 17 couple hours for agencies to respond and then to  
 18 get their people to the staging area where we're  
 19 going to do our traffic briefing and deploy them.  
 20 And then once -- the briefing itself takes about  
 21 an hour. And then once we would deploy them, the  
 22 inner perimeter took an hour and a half to put in  
 23 place, depending on the resistance we got from the  
 24 crowds as we were trying to work our way around

1 with these officers. And about two hours to put  
 2 the outer perimeter in place. So in addition to  
 3 the mutual aid, you know, we're trying -- as day  
 4 three and on, four and five goes on, now I'm  
 5 integrating dozens of National Guard troops,  
 6 Franklin County Engineer dump trucks, ODOT crews.  
 7 You know, I can't close the freeway ramp with a  
 8 cruiser. So I had to bring in Traffic Emergency  
 9 Response Team from City of Columbus and from the  
 10 State to put up the arrows and the long tapers of  
 11 cones, you know, to make it safe for the motoring  
 12 public. I just can't put a cruiser across the  
 13 ramp and say it's closed all night.

14 Q. Right. Right. Okay. Just back to  
 15 that Saturday, the third day of the protests. So  
 16 you made the request around 1:00. And I get it,  
 17 that takes some time to implement?

18 A. I just want to clarify on the time. I  
 19 don't -- I probably have it in my log or my notes  
 20 anywhere, but I don't know exactly the time. It  
 21 was sometime in the afternoon that gave us three-  
 22 or four-hour leeway before the 5:30 roll call  
 23 time. I can tell you that.

24 Q. Cool.

1 ultimately came up with later this summer, he  
 2 would have had 10 cruiser to do that with.

3 Q. Okay.

4 A. He could also have pulled from patrol  
 5 if he needed to. To my knowledge, he never  
 6 implemented any kind of traffic pattern before I  
 7 got into work in the afternoon.

8 Q. Got it.

9 Okay. Just -- and my guess this is not  
 10 your area, but I just want to see what falls  
 11 within traffic and what doesn't. Does your -- I  
 12 keep wanting to say the organization you're in  
 13 charge of, which is obviously incorrect. So --  
 14 but does your -- does your -- what you control,  
 15 would you ever have any involvement in clearing  
 16 people out of an area to allow traffic to come  
 17 through? For example, if I have a bunch of  
 18 protesters in an intersection, would you ever have  
 19 -- excuse me. I can't talk.

20 If I had a bunch of protesters jamming  
 21 up an intersection or -- would you ever -- would  
 22 it ever be your responsibility to send people in  
 23 to clear them out of there to make sure traffic  
 24 could go there?

1 Do you know -- do you know the -- do  
 2 you know if any streets had been closed earlier in  
 3 the day on Saturday before you decided to seek  
 4 mutual aid?

5 A. They had not.

6 Q. Okay.

7 A. No roads were closed. There was  
 8 protests throughout the day, but they stayed on  
 9 the statehouse grounds.

10 Q. Okay. If they had stayed off the  
 11 grounds, if they had gone into the street, would  
 12 roads have been closed?

13 A. Yeah. My first shift sergeant was  
 14 there monitoring it with -- and he had first shift  
 15 freeway patrol, all the motors and all of second  
 16 and third shift freeway I put on the same hours  
 17 starting, like, the second day. So everybody was  
 18 coming in at like 4:30, 5:00 in the evening except  
 19 for first shift motors. We were all working  
 20 12-hour -- I'm sorry, except for first shift  
 21 freeway. And all the people assigned to me were  
 22 at least 12-hour shifts at that point.

23 So had they had a need to implement  
 24 some kind of an emergency traffic plan like we

1 A. No. Never. And I would coordinate --  
 2 so I was -- me, personally, was generally in the  
 3 emergency operations center most of the time. I  
 4 went out every day starting day 3 and did an  
 5 hour-long briefing with all the troops, mutual  
 6 aid, National Guard, whoever, my guys, whoever was  
 7 there, instructions for the day, what radio  
 8 channels and all those kinds of things. And the  
 9 instructions to traffic -- well, first of all, we  
 10 wouldn't put the traffic plan in that intersection  
 11 if it was occupied by protesters or rioters.

12 Q. Right.

13 A. And second of all, for the course of  
 14 the shift I instructed everybody working traffic  
 15 that, A, I wanted them to wear a helmet or have it  
 16 close by because we had -- I had nine damaged  
 17 cruisers from rocks and bricks being thrown  
 18 through the windows. And I instructed every  
 19 officer to have a gas mask on because we were not  
 20 going to abandon the traffic post just because  
 21 there was gas in the area. They were also  
 22 instructed though should a crowd approach their  
 23 intersection or it became unsafe at any point,  
 24 they were to back off and let the crowd have it.

1 The primary goal was to keep innocent traffic out  
 2 of there, you know, to prevent the rioters from  
 3 being resupplied and all of those types of things.  
 4 We can black off two blocks, let the crowd go  
 5 through. And when the crowd is clear, put the  
 6 traffic plan back in place again. That's what I  
 7 instructed and that's what always happened.

8 Q. Got it.

9 And that was from the beginning of the  
 10 protests?

11 A. That was from Day 1.

12 Q. If it's okay with everybody, I do have  
 13 some more, but I'm hoping to be as efficient as  
 14 possible. And it would do me a lot of good in  
 15 terms of timing to take a quick break. Would that  
 16 be all right everyone? Do you want to reconvene  
 17 at, say, 3:10? Would that be all right?

18 A. Fine by me.

19 Q. Yeah.

20 (A short recess is taken.)

21 BY MR. FORMAN:

22 Q. Okay. With regard to traffic, the  
 23 decision to bring in mutual aid, was that decision  
 24 that you had the ability to make independently?

1 for me, I had them working hours something like  
 2 4:30 p.m. to 4:30 a.m. I staggered it on some  
 3 days so that third shift would be there to relieve  
 4 in the morning so they weren't all coming in at  
 5 4:30. But a roll call time would be 5:30.  
 6 Logistically though, I wouldn't let the motorcycle  
 7 officers bring down motorcycles, just because  
 8 they're not protected, so it limited the number of  
 9 vehicles I had. And then about -- I don't know --  
 10 three or four or five days past May 28th, I was  
 11 able to get at least four or five -- maybe six  
 12 even plain cars from our impound lot to give to  
 13 the motorcycle officers so at least they could  
 14 drive a car to the location. So any given day, 10  
 15 officers and a sergeant during the daylight hours,  
 16 that general period. And 35 or so officers and  
 17 four sergeants at night.

18 Q. Okay. Thank you. Just one second  
 19 here. Most attorneys would tell you they just  
 20 have a few more questions. That's not true. But  
 21 I try to keep my word on things like that.

22 So do you have any idea for how many  
 23 mutual aid entities were called for assistance  
 24 during the protests?

1 A. Probably not. And it all times was  
 2 made by an incident commander.

3 Q. Okay. Fair enough.

4 Do you have any feel for the -- if you  
 5 were to bring in a bunch of mutual aid officers,  
 6 if that would incur additional expense for the  
 7 department?

8 A. At no extra expense for the department.

9 Q. Okay. And I think you may have said  
 10 this earlier, but I'm just trying to figure out at  
 11 a given time the amount of officers which would be  
 12 available to you -- I mean, you told me how many  
 13 people work for you. But I assume that they also  
 14 get to sleep periodically. So the officers that  
 15 were available to you, about how many -- I'm just  
 16 saying without calling in mutual aid, about how  
 17 many officers would you have access to and  
 18 vehicles to effectuate a shutdown of traffic in an  
 19 area of the city?

20 A. So because it's 24 hour a day, I had to  
 21 have officers there. I had first shift, so nine  
 22 -- I'm sorry, 10 officers and a sergeant that  
 23 worked, like, 6:30 a.m. to 6:30 p.m.  
 24 approximately. And then everybody else that works

1 A. Do you mean about agencies?

2 Q. Yeah. Yeah.

3 A. It was right around 35 approximately,  
 4 35, 38, something like that.  
 5 Q. Okay. Are there any particular  
 6 difficulties with closing down the downtown area  
 7 of the city as opposed to other areas?

8 A. I'm not sure I understand the question.  
 9 I mean, every area is going to have its own  
 10 challenges. Usually we close it at night so that  
 11 it wasn't a large work crowd or, you know, that  
 12 kind of thing if that's what you're asking.

13 Q. Yeah, I think so. You wouldn't say  
 14 it's any harder to close down a downtown area than  
 15 some other area of the city; is that a fair  
 16 statement?

17 A. Well, yeah, depending on the time of  
 18 day and what's going on downtown, you know, if  
 19 people are working downtown and there's rush hour,  
 20 then obviously that's a big hit. If I had to  
 21 close down the area around Ohio State campus  
 22 depending on what's going on, that could be a big  
 23 hit. You know what I mean?

24 Q. Right. But if it's not rush hour,

1 would that be -- it's not much harder than  
 2 anywhere else in the city?  
 3 A. That's probably fair.  
 4 MR. FORMAN: Okay. I think we're all  
 5 set. Alana, can -- I'm going to ask you for those  
 6 written traffic plans.  
 7 MS. TANOURY: The traffic plans. Okay.  
 8 Can you send me an e-mail with the --  
 9 MR. FORMAN: I will totally have  
 10 somebody send me an e-mail to remind me to send  
 11 you an e-mail, so, yes, for sure.  
 12 MS. TANOURY: Okay. I mean, there is  
 13 so much discovery in this case, so the extent you  
 14 can get it to me in writing, that would be  
 15 helpful.  
 16 MR. FORMAN: Absolutely. I totally get  
 17 it. I hear you. Yes. I see the traffic. So  
 18 yeah, that's all I have. Thank you so much for  
 19 sitting through this. I really appreciate it,  
 20 everyone.  
 21 A. You're welcome.  
 22 Just to clarify one point on the  
 23 traffic plans.  
 24 Q. Sure.

1 - - - -  
 2 Thereupon, the foregoing proceedings  
 3 concluded at 3:20 p.m.  
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1 A. So I have, like, a map for the bigger  
 2 perimeters and stuff. But what you're probably  
 3 going to see or what you're asking for is like the  
 4 rosters, which lists locations by who was assigned  
 5 where.  
 6 Q. Okay.  
 7 A. I assume that's what you're asking for.  
 8 Q. Yeah. But there is a map?  
 9 A. Yeah. I have a handwritten map that  
 10 doesn't really -- it's not what you're looking for  
 11 probably. I can -- you're welcome to it, but it's  
 12 Xs on a -- and highlighted lines on a black and  
 13 white piece of paper. The actual locations are  
 14 recorded on the daily rosters.  
 15 Q. Okay. Yeah. I'll take a look at that.  
 16 But you're right. It may be beyond my feeble  
 17 intellect. I would not be surprised.  
 18 A. It's pretty rough, the map.  
 19 Q. All right. Cool, everyone. Well, you  
 20 guys take care, all right?  
 21 A. Thanks.  
 22 MS. TANOURY: Thanks.  
 23 MR. FORMAN: Thank you very much.  
 24 (Signature not waived.)

1 State of Ohio : C E R T I F I C A T E  
 2 County of Franklin: Ss  
 3 I, Stacy M. Upp, a Notary Public in and for the  
 4 State of Ohio, certify that Lieutenant Paul Weiner  
 5 was by me duly sworn to testify to the whole truth  
 6 in the cause aforesaid; testimony then given was  
 7 reduced to stenotype in the presence of said  
 8 witness, afterwards transcribed by me; the  
 9 foregoing is a true record of the testimony so  
 10 given; and this deposition was taken at the time  
 11 and place specified on the title page.

11 Pursuant to Rule 30(e) of the Federal Rules of  
 12 Civil Procedure, the witness and/or the parties  
 13 have not waived review of the deposition  
 14 transcript.

15 I certify I am not a relative, employee,  
 16 attorney or counsel of any of the parties hereto,  
 17 and further I am not a relative or employee of any  
 18 attorney or counsel employed by the parties hereto,  
 19 or financially interested in the action.

20 IN WITNESS WHEREOF, I have hereunto set my hand  
 21 and affixed my seal of office at Columbus, Ohio, on  
 22 February 23, 2021.

23 Stacy M. Upp, Notary Public - State of Ohio  
 24 My commission expires August 6, 2021.

Witness Errata and Signature Sheet

Correction or Change Reason Code

1-Misspelling    2-Word Omitted    3-Wrong Word

4-Clarification 5-Other (Please explain)

/Line      Correction or Change      Reason C

I, Paul Weiner, have read the entire transcript of my deposition taken in this matter, or the same has been read to me. I request that the changes noted on my errata sheet(s) be entered into the record for the reasons indicated.

Date \_\_\_\_\_ Signature \_\_\_\_\_

The witness has failed to sign the deposition  
within the time allowed.

Date                      Signature

Ref: SII301373PW S-SII P-BW

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